

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

**IN RE:
MICHAEL HEADRICK**

Debtor

) **CASE NO: 16-43379-659**
) **Chapter 13**
)
) **Trustee's Objection to Confirmation**
) **Original Confirmation Hearing set for:**
) **June 23, 2016 11:00 am**

TRUSTEE'S OBJECTION TO CONFIRMATION OF 1ST AMENDED PLAN

COMES NOW John V. LaBarge, Jr., Standing Chapter 13 Trustee, and for his objection to confirmation states as follows:

1. Debtor lacks sufficient income to fund the plan.
2. The set monthly payments to be made by the Trustee exceed the plan payment.
3. 5c lacks repay period.
4. Schedule C fails to properly claim entireties exemption under RSMO 513.475.2 and 11 USC 522(b)(3)(B).

WHEREFORE the Trustee prays the Court enter its order denying confirmation of the proposed plan.

Dated: June 24, 2016

OBJCONF--KLW

/s/ Kathy Wright

Kathy Wright MO31047

Attorney for Trustee

P.O. Box 430908

St. Louis, MO 63143

(314) 781-8100 Fax: (314) 781-8881

trust33@ch13stl.com

The undersigned hereby certifies that he served the above notice on this day of June 24, 2016, either through the Court's ECF system or by ordinary mail, postage pre-paid, addressed to:

/s/ Kathy Wright

MICHAEL HEADRICK
4516 THOLOZAN AVE
SAINT LOUIS, MO 63116

ANGELA REDDEN-JANSEN
3350 GREENWOOD BLVD
C/O O'GORMAN & SANDRONI PC
MAPLEWOOD, MO 63143